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Attorneys for Defendants
BERBERIAN NUT COMPANY, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JUANA MERCADO,

Plaintiff,

vs.

BERBERIAN NUT COMPANY; and DOES 1-50,
inclusive,

Defendants.

CASE NO. 2:24-CV-01825-TLN-DMC

**JOINT STIPULATION AND
PROPOSED ORDER TO AMEND
SCHEDULING ORDER**

Complaint Filed:	4/25/2024
Removed:	6/28/2024
Trial Date:	Not set

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rules 143 and 144(d), and for good cause shown, Plaintiff JUANA MERCADO (“Plaintiff”) and Defendant BERBERIAN NUT COMPANY, LLC (“Defendant”), by and through their respective attorneys of record,

1 stipulate and agree as follows:

2 1. This case was filed on April 25, 2024 in Butte Superior Court (Case No.
3 24CV01362).

4 2. Defendant removed the case on June 28, 2024 (Docket No. 1).

5 3. The parties have actively litigated this case.

6 4. In an effort to conserve judicial resources and those of the parties, the parties have
7 agreed to go to mediation in an attempt to resolve this case.

8 5. Mediation has been scheduled for June 26, 2025.

9 6. The deadline for this case, as laid out in the scheduling order, are as follows:

10 a. Discovery closes: June 28, 2025

11 b. Expert disclosures: August 27, 2025

12 c. Supplemental list of expert witnesses: September 26, 2025

13 d. Supplemental disclosures and responses: November 25, 2025

14 e. Motion for Summary Judgment deadline: December 25, 2025

15 f. Notice of Trial Readiness: January 24, 2026

16 7. If the parties are unable to resolve this case at mediation, both parties wish to have
17 time to conduct further discovery before discovery closes.

18 8. The parties are requesting that the listed above be continued for ninety (90) days, or
19 as otherwise provided by the Court, while the parties attempt mediation.

20 9. The parties will not be prejudiced by a continuance of the current pre-trial deadlines.

21 **NOW THEREFORE**, the parties, through their respective counsel, jointly propose and
22 stipulate to the following: the deadlines in the Pretrial Scheduling Order previously set forth by the
23 Court shall be revised as follows, or set on such other dates as the Court determines:

24

<u>Event</u>	<u>Current Date</u>	<u>Proposed New Date</u>
Discovery closes	June 28, 2025	September 26, 2025
Expert disclosures	August 27, 2025	November 25, 2025
Supplemental list of expert witnesses	September 26, 2025	December 26, 2025

Supplemental disclosures and responses	November 25, 2025	February 23, 2026
Motion for Summary Judgment deadline	December 25, 2025	March 25, 2026
Notice of trial readiness deadline	January 24, 2026	April 24, 2026

Dated: 05-12-2025

LAW OFFICES OF LARRY L. BAUMBACH

By: /s/ Larry L. Baumbach [as authorized 05.12.15]
LARRY L. BAUMBACH

Attorney for Plaintiff
JUANA MERCADO

Dated: 05-13-2025

JACKSON LEWIS P.C.

By: /s/ Evan D. Beecher
EVAN D. BEECHER
BENJAMIN A. HUNTER

Attorneys for Defendant
BERBERIAN NUT COMPANY, LLC

ORDER

FOR GOOD CAUSE SHOWN, and pursuant to the Stipulation of the parties, the deadlines in the Pretrial Scheduling Order (Doc. No. 4) previously set forth by the Court are revised as follows:

1. The discovery deadline, presently scheduled to close on June 28, 2025, will now close on September 26, 2025; or as otherwise provided by the Court.

2. Expert disclosures, presently due on August 27, 2025, will now be due on November 25, 2025; or as otherwise provided by the Court.

3. Supplemental list of expert witnesses, presently due on September 26, 2025, will now be due on **December 29, 2025**; or as otherwise provided by the Court.

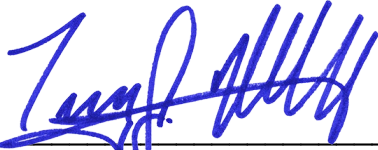
4. Supplemental disclosures and responses, presently due on November 25, 2025, will now be due on February 23, 2026; or as otherwise provided by the Court.

5. The motion for summary judgment deadline, presently on December 25, 2025, will now be set for March 25, 2026; or as otherwise provided by the Court.

6. The notice of trial readiness, presently due on January 24, 2026, will now be due on April 24, 2026; or as otherwise provided by the Court.

IT IS SO ORDERED.

DATED: May 14, 2025



Troy L. Nunley
Chief United States District Judge